

EXHIBIT

2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

ULTIMA SERVICES CORPORATION,

Plaintiff,

v.

No.

U.S. DEPARTMENT OF AGRICULTURE,

2:20-cv-00041-

U.S. SMALL BUSINESS

DCLC-CRW

ADMINISTRATION, SECRETARY OF

AGRICULTURE, and ADMINISTRATOR

OF THE SMALL BUSINESS

ADMINISTRATION,

Defendants.

VIDEOCONFERENCE DEPOSITION OF

DANNY MANDELL

DATE: Monday, May 16, 2022

TIME: 9:26 a.m.

LOCATION: Remote Proceeding

Washington, D.C. 20005

REPORTED BY: Richard Livengood, Notary Public

JOB NO.: 5230091

5230091		5230091	
Page 2		Page 4	
1 A P P E A R A N C E S		1 E X H I B I T S (Cont'd)	
2 ON BEHALF OF PLAINTIFF ULTIMA SERVICES CORPORATION:		2 NO. DESCRIPTION PAGE	
3 MICHAEL E. ROSMAN, ESQUIRE (by videoconference)		3 Exhibit 0009 Alabama Offer Letter to SBA in	
4 MICHELLE SCOTT, ESQUIRE (by videoconference)		4 Alabama 109	
5 Center for Individual Rights		5 Exhibit 0010 Acceptance Letter from Alabama to	
6 1100 Connecticut Avenue Northwest, Suite 625		6 Use the Contractor 112	
7 Washington, D.C. 20036		7 Exhibit 0011 Sole Source Letter to Ms. Mackin,	
8 rosman@cir-usa.org		8 General Clerk 118	
9 scott@cir-usa.org		9 Exhibit 0012 Acceptance Letter 121	
10 (202) 833-8400		10 Exhibit 0013 Offer Letter to State of Virginia,	
11		11 Administrative Support 125	
12 ON BEHALF OF DEFENDANTS U.S. DEPARTMENT OF		12 Exhibit 0014 Acceptance Letter 133	
13 AGRICULTURE, U.S. SMALL BUSINESS ADMINISTRATION,		13 Exhibit 0015 Order for Supplies or Services 133	
14 SECRETARY OF AGRICULTURE, and ADMINISTRATOR OF THE		14 Exhibit 0016 Letter Written by Mr. Mandell 128	
15 SMALL BUSINESS ADMINISTRATION:		15 Exhibit 0017 Contract for Support Services,	
16 JULIET GRAY, ESQUIRE (by videoconference)		16 State of Tennessee 130	
17 Department of Justice Civil Rights Division		17 Exhibit 0018 Offer Letter 132	
18 Employment Litigation Section		18 Exhibit 0019 Modification to Contract 139	
19 150 M Street Northeast		19 (Exhibits attached.)	
20 Washington, D.C. 20530		20	
21 juliet.gray@usdoj.gov		21	
22		22	
Veritext National Court Reporting Company		Veritext National Court Reporting Company	
202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000		202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000	

5230091		5230091	
Page 3		Page 5	
1 I N D E X		1 P R O C E E D I N G S	
2 EXAMINATION: PAGE		2 THE REPORTER: My name is Richard	
3 By Mr. Rosman 7		3 Livengood; I am the reporter assigned by Veritext to	
4 By Ms. Gray 146		4 take the recording of this proceeding. We are now on	
5 By Mr. Rosman 154		5 the record at 9:26 a.m.	
6 By Ms. Gray 158		6 This is the deposition of Danny Mandell	
7		7 taken in the matter of Ultima Services Corporation vs.	
8 E X H I B I T S		8 United States Department of Agriculture, United States	
9 NO. DESCRIPTION PAGE		9 Small Business Administration, Secretary of	
10 Exhibit 0001 Decision Memo 46		10 Agriculture, and Administrator of the Small Business	
11 Exhibit 0002 Document Signed by Witness,		11 Administration on May 16, 2022, remote via Zoom	
12 Offer Letter 61		12 meeting.	
13 Exhibit 0003 E-mail Chain 66		13 I am a notary authorized to take	
14 Exhibit 0004 Adverse Impact Determination		14 acknowledgements and administer oaths in Maryland.	
15 Letter 75		15 Parties agree that I will swear in the witness	
16 Exhibit 0005 Offer Letter for Kentucky NRCS 87		16 remotely, outside of his or her presence.	
17 Exhibit 0006 Acceptance Letter from SBA Allowing		17 Additionally, absent an objection on	
18 to Proceed 99		18 the record before the witness is sworn, all parties	
19 Exhibit 0007 Letter, July 9 to Mr. White,		19 and witness understand and agree that any certified	
20 Sole Source Offer Letter 102		20 transcript produced from the recording, virtually, of	
21 Exhibit 0008 Letter of Service and Acceptance		21 this proceeding:	
22 of Offer 108		22 - is intended for all uses permitted	
Veritext National Court Reporting Company		Veritext National Court Reporting Company	
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<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 86</p> <p>1 Q Did -- during the course of the conversation</p> <p>2 that you had with your supervisors, did they say</p> <p>3 anything that indicated that they had the same</p> <p>4 understanding?</p> <p>5 A I believe so. They didn't understand why.</p> <p>6 Q Okay. All right.</p> <p>7 A So.</p> <p>8 Q All right. Why don't we go back to Exhibit</p> <p>9 Share, and let's just take a look one brief moment</p> <p>10 again at Exhibit 4. Okay. And this is a letter from</p> <p>11 the district director, Terri Denison, to you,</p> <p>12 basically saying that the SBA would not recommend</p> <p>13 acceptance of the contract into the 8(a) program</p> <p>14 because of adverse impact.</p> <p>15 A Yes. That's what the letter's saying.</p> <p>16 Q Were you done with your answer?</p> <p>17 A Yes, sir.</p> <p>18 Q Okay. Good. All right. So why don't we go</p> <p>19 back to Exhibit Share. And this is to -- I'm sorry.</p> <p>20 One more question. This is dated September 20; right?</p> <p>21 A Yes. That's correct.</p> <p>22 Q Okay. Let's go to Exhibit 5, please.</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 88</p> <p>1 with Ausdanbrook Properties during the period of time</p> <p>2 that you were communicating with the SBA about any</p> <p>3 adverse impact analysis?</p> <p>4 A No. Not in, not in reference to the adverse</p> <p>5 impact analysis. I have talked to them but not in, in</p> <p>6 reference to that.</p> <p>7 Q Okay. Okay. Well, did you talk to them</p> <p>8 about the requirement, generally, that -- for support</p> <p>9 services in Mississippi?</p> <p>10 A Correct. But not specifically.</p> <p>11 Q Let me try that again. Did you -- so from</p> <p>12 the time that you sent the offer letter to the SBA</p> <p>13 'til the time that Ms. Denison wrote to you about the</p> <p>14 adverse impact, were you in communication with</p> <p>15 Ausdanbrook Properties about the Mississippi</p> <p>16 requirement?</p> <p>17 A No.</p> <p>18 Q Okay. You didn't speak to them at all</p> <p>19 during that period of time?</p> <p>20 A No. Only initially when I asked them if</p> <p>21 they had the, if they could meet such type of</p> <p>22 requirement.</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>
<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 87</p> <p>1 (Exhibit 0005 was marked for</p> <p>2 identification.)</p> <p>3 A Okay. This is to Washington, D.C., SBA.</p> <p>4 Q Okay. Okay. And so why don't you tell us</p> <p>5 what this document is, if you recognize it.</p> <p>6 A It's also an offer letter.</p> <p>7 Q And what is it an offer letter for?</p> <p>8 A Thirty-seven program support specialists for</p> <p>9 Kentucky.</p> <p>10 THE REPORTER: Can you repeat that,</p> <p>11 please?</p> <p>12 THE WITNESS: It says here for 37</p> <p>13 program support specialists for Kentucky NRCS. In</p> <p>14 Kentucky.</p> <p>15 THE REPORTER: Thank you.</p> <p>16 BY MR. ROSMAN:</p> <p>17 Q Was it for Kentucky, though?</p> <p>18 A No. This is for Mississippi.</p> <p>19 Q And is this the same requirement that we saw</p> <p>20 in Exhibit 2?</p> <p>21 A Yes. It is but on a different template.</p> <p>22 Q Okay. By the way, had you been in contact</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 89</p> <p>1 Q Right. Did they ever withdraw their offer?</p> <p>2 A No, because they can't submit an offer yet</p> <p>3 and the, and get an SBA acceptance letter.</p> <p>4 Q Well, I guess I'm asking you whether</p> <p>5 Ausdanbrook Properties, during this period of time,</p> <p>6 communicated to you to tell you that they were no</p> <p>7 longer interested in that requirement.</p> <p>8 A No.</p> <p>9 Q Okay. All right. Who is Ms. Mackin?</p> <p>10 A One second. My Internet's going down.</p> <p>11 Ms. Mackin, I believe, is a, a, is another</p> <p>12 SBA representative in a different state.</p> <p>13 Q Why were you writing to her?</p> <p>14 A Why was -- after we talked about it,</p> <p>15 supervisor said try getting SBA, explain them the</p> <p>16 situation, and tell them that you had a adverse impact</p> <p>17 when you, you had a talk with the other SBA office,</p> <p>18 and see what they will come up with.</p> <p>19 Q So you thought they just might, you could</p> <p>20 just write to a different SBA office and maybe get a</p> <p>21 different result?</p> <p>22 MS. GRAY: Object to form.</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>

<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 90</p> <p>1 A No. That wasn't for the purpose of that.</p> <p>2 Q Okay. Why were you writing to Ms. Mackin?</p> <p>3 A Purpose of writing to Ms. Mackin -- or I'm</p> <p>4 not sure if she was the one that called directly --</p> <p>5 explained that I have initially talked different SBA</p> <p>6 in Georgia and informed, and they informed me that --</p> <p>7 I told them why -- I -- what, what kind of requirement</p> <p>8 I have and the, on the phone that our discussion</p> <p>9 was -- this will be an adverse impact on the contract,</p> <p>10 on that contract if we awarded to an 8(a).</p> <p>11 After my conversation -- that was before my</p> <p>12 conversation with my supervisor. My supervisor told</p> <p>13 me to get hold of the SBA, see what they say, inform</p> <p>14 them of the conversation, inform them about the</p> <p>15 adverse impact. Why wouldn't you? But that's the</p> <p>16 reason why that letter was sent out. The -- what they</p> <p>17 would -- what would they find versus what Georgia SBA</p> <p>18 office find.</p> <p>19 Q I'm a little unclear about that, so let's,</p> <p>20 let me just ask a few more questions. What did you</p> <p>21 understand the part of SBA that Ms. Mackin was working</p> <p>22 for to be?</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 92</p> <p>1 A No. That wasn't the purpose of that. We</p> <p>2 were -- the purpose was us trying to find out whether</p> <p>3 what, another SBA will come up with the same results.</p> <p>4 Q So having received a determination by the</p> <p>5 Georgia district office that there had been adverse</p> <p>6 impact, you wanted to see whether a different SBA</p> <p>7 office would arrive at a different determination; is</p> <p>8 that right?</p> <p>9 MS. GRAY: Object to form.</p> <p>10 A I didn't get the letter. It was through</p> <p>11 conversation by phone.</p> <p>12 Q With whom?</p> <p>13 A With Ms. Collins.</p> <p>14 Q I'm sorry. What did Ms. Collins say in this</p> <p>15 phone conversation?</p> <p>16 A When I finally got in contact with Ms.</p> <p>17 Collins, we were talking about the adverse impact.</p> <p>18 She was saying that there would be an adverse impact</p> <p>19 if, if we approved the offer letter. And I asked her</p> <p>20 why because the contract's ending September 30th. We</p> <p>21 can no longer execute a task order under that</p> <p>22 contract. And that's when -- after that conversation</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>
<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 91</p> <p>1 A That Mackin is working to be?</p> <p>2 Q Let me try that again -- let me ask -- let</p> <p>3 me just ask the question again. Ms. Mackin was</p> <p>4 working for a different district office; right?</p> <p>5 A Okay. That's correct.</p> <p>6 Q Okay. And your proposed 8(a) contractor</p> <p>7 initially was Ausdanbrook Properties; right?</p> <p>8 A Correct.</p> <p>9 Q And you would normally write an offer letter</p> <p>10 to the SBA office that supervised the proposed 8(a)</p> <p>11 contractor for a sole source 8(a) contract; is that</p> <p>12 right?</p> <p>13 A That's correct within that state.</p> <p>14 Q Okay. And in this case that was the Georgia</p> <p>15 office; right?</p> <p>16 MS. GRAY: Object to form.</p> <p>17 A Right. The state of Georgia.</p> <p>18 Q Say it again.</p> <p>19 A That's correct. State of Georgia.</p> <p>20 Q Okay. Did you understand that Ms. Mackin</p> <p>21 could overrule the determination that had been made in</p> <p>22 the state of Georgia district office?</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 93</p> <p>1 that's when I went to my supervisor and explained to</p> <p>2 them about the adverse impact study that was done by</p> <p>3 Ms. Collins.</p> <p>4 Q Okay. I'm still not at the point where I</p> <p>5 understand why you were writing to Ms. Mackin. Was it</p> <p>6 your understanding that a different SBA district</p> <p>7 office could come up with a different conclusion as to</p> <p>8 whether there was or was not adverse impact?</p> <p>9 MS. GRAY: Object to form.</p> <p>10 A That's correct.</p> <p>11 Q You thought they, it could; right?</p> <p>12 A We wanted to know what the, what kind of,</p> <p>13 what, what was the main reason that Georgia came up</p> <p>14 with adverse impact 'cause we did not understand it.</p> <p>15 Q Well --</p> <p>16 A The reason for it. Explained to Ms. Collins</p> <p>17 that I don't understand why there would be an adverse</p> <p>18 impact when the contract, as of September 30, no more</p> <p>19 viable, is no longer viable.</p> <p>20 Q Was it your understanding that you could</p> <p>21 appeal the decision of the Georgia district office to</p> <p>22 some other part of the SBA?</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>

<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 150</p> <p>1 have to use a, the, the, that IDIQ to fulfill that</p> <p>2 requirement by using task orders executed against it.</p> <p>3 Q So did the IDIQs guarantee that Ultima would</p> <p>4 get all admin work at NRCS offices?</p> <p>5 A It's a priority to the IDIQ but doesn't</p> <p>6 guarantee it.</p> <p>7 Q And how -- what do you mean by that?</p> <p>8 A Even though we -- and even though we have an</p> <p>9 IDIQ, doesn't necessarily -- it's not a -- I mean, we,</p> <p>10 we -- it's a priority, but in addition if we believe</p> <p>11 there's only, like, one or two requirements, so</p> <p>12 instead of using that IDIQ vehicle and just competed.</p> <p>13 Q Okay.</p> <p>14 A And -- oh. Okay. Never mind.</p> <p>15 Q Mr. Rosman asked you some questions about</p> <p>16 whether it would've been possible to extend Ultima's</p> <p>17 task order so that there would be time to bid it.</p> <p>18 What is the time limit on extending a task order?</p> <p>19 A Extending a task order?</p> <p>20 Q Yes. Do you recall what I'm talking about?</p> <p>21 A Normally -- we don't normally extend the</p> <p>22 task order.</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 152</p> <p>1 long as there's still existing funds, we could use, we</p> <p>2 could extend it. But we could only extend it to the</p> <p>3 amount that the funds allows us. No more than that.</p> <p>4 In other words, we can't extend it and put additional</p> <p>5 funds. That would be outside the scope of the</p> <p>6 original contact -- contract.</p> <p>7 Q Okay. When we were discussing after you got</p> <p>8 the adverse impact determination from Georgia, you</p> <p>9 were then shown the offer letter that you sent to the</p> <p>10 D.C. district office. Do you recall that?</p> <p>11 A Which district office, ma'am? The Georgia</p> <p>12 or the Washington?</p> <p>13 Q So after you received the adverse impact</p> <p>14 determination from Georgia, you then sent an offer</p> <p>15 letter to the Washington, D.C. district office; is</p> <p>16 that right?</p> <p>17 A I believe I did not receive that offer</p> <p>18 letter, I mean, that adverse impact letter from</p> <p>19 Georgia before I sent the offer letter --</p> <p>20 Q Okay. Right. Okay. But you had heard from</p> <p>21 them.</p> <p>22 A -- conversation.</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>
<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 151</p> <p>1 Q Right. But do you remember we were looking</p> <p>2 at a particular document that mentioned that the</p> <p>3 contract might be extended for two months?</p> <p>4 A Yes.</p> <p>5 Q And then you talked about how you might</p> <p>6 extend it so that you could get another contract in</p> <p>7 place. Do you remember that?</p> <p>8 A Right. Similar to what we saw in "mod" 1.</p> <p>9 Q So --</p> <p>10 A Where it was extended because of the issue</p> <p>11 of onboarding instruction.</p> <p>12 Q So is there -- what is the time limit on</p> <p>13 extending a contract or task order?</p> <p>14 A I believe two months is, is the most. Or is</p> <p>15 it three months?</p> <p>16 Q Okay.</p> <p>17 A I have to look at the regulation for that</p> <p>18 particular extension authorization.</p> <p>19 Q Okay. That's something that would be in the</p> <p>20 FAR?</p> <p>21 A Right. I think it's -- can't -- I don't</p> <p>22 remember what that regulation is. But as long, as</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 153</p> <p>1 Q Okay. You had heard --</p> <p>2 A But it was a phone conversation. I'm sorry,</p> <p>3 ma'am.</p> <p>4 Q No. It's okay. I'm sorry I interrupted</p> <p>5 you. I understand. It was -- you heard that on the</p> <p>6 phone. But I believe you testified about a discussion</p> <p>7 you had with your supervisor after that, and I think</p> <p>8 there was some, you know, some delay during that time.</p> <p>9 So I just wanted to confirm that after you received</p> <p>10 the, you learned from Georgia that they were going to</p> <p>11 issue an adverse impact determination, what was the</p> <p>12 conversation that you had with your supervisor about</p> <p>13 approaching D.C.?</p> <p>14 A As -- as I stated earlier, was, we just</p> <p>15 couldn't understand -- and that -- and same question I</p> <p>16 had for Ms. Collins was that why would you, why would</p> <p>17 there be an adverse impact when the contract is no</p> <p>18 longer viable and would be ending? And similar</p> <p>19 discussion was brought up with my supervisor, the same</p> <p>20 thing. That was our conversation.</p> <p>21 Q And when you spoke with the D.C. district</p> <p>22 office, did you tell them about the adverse impact</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>

<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 154</p> <p>1 determination from Georgia?</p> <p>2 A Yes. I called them up, like I also called</p> <p>3 up the SBA and -- when I need a requirement. I, I</p> <p>4 told them exactly what I need and, or what the issue</p> <p>5 is.</p> <p>6 MS. GRAY: Okay. I don't have any</p> <p>7 further questions.</p> <p>8 MR. ROSMAN: I just have one or two</p> <p>9 more.</p> <p>10 EXAMINATION</p> <p>11 BY MR. ROSMAN:</p> <p>12 Q So you spoke with the Washington, D.C.,</p> <p>13 office concerning the adverse impact determination</p> <p>14 that had been made by the Georgia district office;</p> <p>15 right?</p> <p>16 A I believe so, because when my conversation</p> <p>17 with my supervisor, they did remind me, make sure that</p> <p>18 you inform them of the recent issue.</p> <p>19 Q Okay. And what did they say when you told</p> <p>20 them that?</p> <p>21 A I think the statement was, if, we will</p> <p>22 check, we will do our evaluation. If there is an</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 156</p> <p>1 my supervisor and the fact that if we got less than</p> <p>2 two weeks before the end of the year, I believe it was</p> <p>3 my supervisor that gave me the name of the All-Pro and</p> <p>4 said, "Try these guys, but here's the SBA office.</p> <p>5 Give them a call. Explain what's going on. See what</p> <p>6 they say."</p> <p>7 Q Okay. But why did using All-Pro require you</p> <p>8 to write to the office in the District of Columbia?</p> <p>9 A 'Cause All-Pro belongs to, under the SBA</p> <p>10 office in District of Columbia.</p> <p>11 Q Why is that? Why?</p> <p>12 A What -- what do you mean, why?</p> <p>13 Q Why?</p> <p>14 A Why is that?</p> <p>15 Q Why do they belong to the district of the</p> <p>16 District of Columbia?</p> <p>17 A They, they belong the jurisdiction -- for</p> <p>18 the District of Columbia, not Georgia.</p> <p>19 Q But, in fact, didn't the district of the</p> <p>20 District of Columbia transfer the entire offer to a</p> <p>21 different district office?</p> <p>22 A I don't remember. I don't have any document</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>
<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 155</p> <p>1 adverse impact, we will let you know; if not, if</p> <p>2 there's not an adverse impact, we'll send you an</p> <p>3 acceptance letter. And that's the same thing I</p> <p>4 communicated to my supervisors.</p> <p>5 Q So the district office in the District of</p> <p>6 Columbia didn't feel bound by any determination that</p> <p>7 had been made by the district office in Georgia.</p> <p>8 MS. GRAY: Object to form.</p> <p>9 BY MR. ROSMAN:</p> <p>10 Q Is that right?</p> <p>11 A Well, I'm, I'm not sure, sir.</p> <p>12 Q Well, they said they were going to do their</p> <p>13 own analysis; right?</p> <p>14 A Right. But I'm not sure where -- like I</p> <p>15 said, I'm not part of their, anticipating how they do</p> <p>16 this stuff. So.</p> <p>17 Q Okay.</p> <p>18 A All I could do is provide the information.</p> <p>19 Q Why, again, did you write to the district</p> <p>20 office in Washington, D.C.?</p> <p>21 A After our, after we, after my phone call</p> <p>22 with Ms. Collins on that -- my explanation we had with</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>	<p style="text-align: center;">5230091</p> <p style="text-align: right;">Page 157</p> <p>1 that shows that. I don't believe they would.</p> <p>2 Q Well, why don't we take a look at Exhibit 6</p> <p>3 again, please.</p> <p>4 A Exhibit 6. Okay. Baltimore district</p> <p>5 office. Maryland.</p> <p>6 Q Right. So --</p> <p>7 A Okay. Yeah. It's Maryland.</p> <p>8 Q Apparently Ms. Mackin in the Washington,</p> <p>9 D.C., district office didn't handle the offer letter;</p> <p>10 right?</p> <p>11 A That is correct from the what I see now.</p> <p>12 Yeah -- look like --</p> <p>13 Q So why did you send it to the Washington,</p> <p>14 D.C., district office?</p> <p>15 A Because they were the people I was working</p> <p>16 with. I initially thought that All-Pro Placement</p> <p>17 Services -- I probably thought that the All-Pro</p> <p>18 Placement Services was under Washington district</p> <p>19 office.</p> <p>20 Q Well, the All-Pro Placement Services has an</p> <p>21 address in Cockeysville, Maryland; right?</p> <p>22 A Right.</p> <p style="text-align: center;">Veritext National Court Reporting Company 202-857-3376 302-571-0510 410-837-3027 610-434-8588 215-241-1000</p>